

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 09-108
v.	*	SECTION: "I"
GLEND A HALL	*	
aka G. Marie Hall	*	
aka Glenda M. Hall	*	
*	*	*

F A C T U A L B A S I S

If this case were to proceed to trial, the Government would prove by competent evidence beyond a reasonable doubt that defendant **GLEND A HALL** (hereafter "**HALL**") was guilty of wire fraud and conspiracy to commit theft of government funds. The Government would prove through testimony and documentary evidence that **HALL** conspired with others to steal funds of the United States: to wit, the United States Railroad Retirement Board ("RRB"), the United States Veterans Administration("VA"), the United States Department of Defense Finance and Accounting Service ("DFAS"), and the United States Office of Personnel Management ("OPM"), which were departments and agencies of the United States, to which **HALL** was not entitled.

The Government would introduce admissible evidence in the form of business records from the OPM, the VA, and DFAS, as well bank records, and other documents and testimony to prove the following facts:

In May 2003, OPM became suspicious of fraudulent activity on a number of retirement accounts of deceased retirees. Through its investigation, OPM discovered that the electronic fund

transfer of retirement funds belonging to deceased retirees from around the country were being deposited into bank accounts in the New Orleans, Louisiana area. Additionally, on several occasions, U.S. Department of Treasury annuity checks sent via U.S. Mail were fraudulently diverted to various New Orleans addresses. Further investigation by OPM identified other agencies, such as the VA, the RRB, and DFAS, whose payments to employees were also diverted into several banks in the New Orleans, Louisiana, area, and whose addresses were also changed to addresses in the New Orleans, Louisiana, area. The investigation revealed that **HALL** was using her telephone number from her residence in New Orleans, Louisiana, to make many of these changes. The investigation also revealed that **HALL** enlisted the aid of her friends to have mail of the deceased redirected to their addresses or to addresses or bank accounts in the New Orleans, Louisiana area to which they had access to further the conspiracy to commit theft of government funds.

In order to accomplish the conspiracy to commit theft of government funds, **HALL**, who was never authorized to receive DFAS payments on behalf of F.V.L., received electronic DFAS payments on his behalf. More specifically, on May 8, 2004, F.V.L., who was receiving DFAS benefits, died. After F.V.L.'s death, **HALL** fraudulently changed F.V.L.'s mailing address to a New Orleans, Louisiana, address to which **HALL** and her conspirators had access. **HALL** also changed the payment address to Wells Fargo Bank, account number XXX5829, an account which **HALL** controlled. Between June 1, 2004 and August 2, 2004, DFAS electronically deposited a total of \$3,060.30 directly into this account for F.V.L. **HALL** and others knowingly converted the funds belonging to the United States having a value of more than \$1000, which they were not authorized to receive, and with the intent of depriving the United States of the funds.

On August 16, 2004, A.J.N, who was receiving OPM annuity benefits, died. **HALL** was

never authorized to receive OPM payments on behalf of A.J.N. On or about September 2004, **HALL**, knowingly and intentionally devised a scheme and artifice to defraud the United States, when on September 13, 2004, using her residential telephone number, within the Eastern District of Louisiana, **HALL** contacted OPM outside of the State of Louisiana and fraudulently requested A.J.N.'s direct deposit information be changed to Hibernia National Bank, account number XXX7078, which was controlled by **HALL**, and falsely and fraudulently had A.J.N.'s address changed to a New Orleans, Louisiana address to which **HALL** had access. Thereafter, on or about October 1, 2004, in the Eastern District of Louisiana, **HALL**, for the purpose of executing the aforesaid scheme and artifice to defraud and obtain money and property by means of false and fraudulent material representations, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals and sounds by means of a wire transfer of \$3060.00 of OPM funds for A.J.N. from the United States Treasury in Washington, D.C., to Hibernia National Bank, account number XXX7078, in the Eastern District of Louisiana, for which the defendant knew she was not entitled.

The Government would prove that the amount of restitution for the purposes of these offenses is approximately \$301,687.62.

READ AND APPROVED:

PROVINO MOSCA (Date)
Counsel for Defendant

LOAN "MIMI" NGUYEN (Date)
Assistant U.S. Attorney

GLENDAL HALL (Date)
Defendant